

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: Dauphin

Magisterial District Number: 12-3-03
MDJ: Hon. William Wenner
Address: 5925 Stevenson Avenue, Suite B
Harrisburg, PA 17112
Telephone: (717)545-0261



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

Robert

(NAME and ADDRESS):

Mellow

MR.

First Name

Middle Name

Last Name

Gen.

110 Oak Hill Drive, Archbald, PA 18403

NCIC Extradition Code Type

- ☐ 1-Felony Full ☐ 4-Felony No Ext. ☐ B-Misdemeanor Limited ☐ E-Misdemeanor Pending
☐ 2-Felony Ltd. ☐ 5-Felony Pend. ☐ C-Misdemeanor Surrounding States
☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ D-Misdemeanor No Extradition
☐ Distance: _____

DEFENDANT IDENTIFICATION INFORMATION

RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown	Docket Number	Date Filed / /	OTN/LiveScan Number	Complaint/Incident Number 36-595
		DOB 12/10/1942	POB		
		Add'l DOB / /	Add'l SSN - -		
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female		First Name	Middle Name	Last Name	Gen.
		AKA			

SID:	HAIR COLOR <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> BLN (Blonde / Strawberry) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> WHI (White) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> SDY (Sandy)	EYE COLOR <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> XXX (Unknown) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> MAR (Maroon)
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Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Driver License State PA License Number	Expires: / /	WEIGHT (lbs.)
DNA <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	DNA Location		
Fingerprint Classification:	MNU Number		FT. HEIGHT in.

DEFENDANT VEHICLE INFORMATION

Plate #	State	Hazmat <input type="checkbox"/>	Registration Sticker (MM/YY) /	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code
VIN	Year	Make	Model	Style	Color	

Office of the attorney for the Commonwealth ☒ Approved ☐ Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

DAG Laurel Brandstetter

(Name of the attorney for the Commonwealth)

Laurel Brandstetter
(Signature of the attorney for the Commonwealth)

3/13/2013
(Date)

I, SA Robert M. Gift / Cpl. Leo D. Hannon Jr.

(Name of the Affiant)

#139 / #7865

(PSP/MPOTC -Assigned Affiant ID Number & Badge #

of the PA Office of Attorney General/PA State Police

PA065015A

(Identify Department or Agency Represented and Political Subdivision)

(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above

☐ I accuse the defendant whose name is unknown to me but who is described as _____

☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at []

(Subdivision Code) (Place-Political Subdivision)

in Dauphin County

[]
(County Code)

on or about March 1, 2005 and dates thereafter



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number 36-595
Defendant Name	First: Robert	Middle:	Last: Mellow

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate :

(Set forth a **brief** summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A
--	---	--	--	--	--	--	---

<input type="checkbox"/>	1	911	(b)(3)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

Statute Description/Acts of the accused associated with this Offense: 1

Corrupt Organizations

On or about March 1, 2005 and dates thereafter, the Actor, while employed by or associated with an enterprise, namely the Pennsylvania Turnpike Commission, did conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs, namely the award of contracts, through a pattern of racketeering activity, namely the Actor, as a principal and/or as an accomplice on multiple occasions, engaged in commercial bribery and/or violated a duty to act disinterestedly in the award of contracts by the Pennsylvania Turnpike Commission, in violation of Section 911(b)(3) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §911(b)(3).

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A
--	---	--	--	--	--	--	---

<input type="checkbox"/>	2	911	(b)(4)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

Statute Description/Acts of the accused associated with this Offense: 2

Corrupt Organizations

On or about March 1, 2005 and dates thereafter, the Actor, while employed by or associated with an enterprise, namely the Pennsylvania Turnpike Commission, did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a violations of 18 Pa.C.S.A. § 911(b)(3), that is, did conspire and agree with Mitchell Rubin, Joseph Brimmeler, George Hatalowich, and/or others that they or one or more of them would conduct or participate, directly or indirectly, while employed by or associated with an enterprise engaged in commerce consisting of commercial bribery and breach of duty to act disinterestedly in the award of contracts, in the affairs of the said enterprise through a pattern of racketeering activity as defined in Title 18 Pa.C.S.A. §911(h)(1), in violation of Section 911(b)(4) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §911(b)(4).

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A
--	---	--	--	--	--	--	---

<input type="checkbox"/>	3	4108	(b)	of the	18	1	M2		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

Statute Description/Acts of the accused associated with this Offense: 3

Commercial Bribery

On or about March 1, 2005 and dates thereafter, the Actor, who holds himself out to the public as being engaged in the business of making disinterested selection, appraisal, or criticism of commodities or services, namely the award of contracts, agreements, leases, and/or work orders with the Pennsylvania Turnpike Commission, solicited, accepted, or agreed to accept any benefit to influence his selection, appraisal, or criticism, namely campaign contributions and/or political benefit and/or continued employment and/or gifts and/or entertainment and/or travel and/or any other benefit, in violation of Section 4108(b) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §4108(b).



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number 36-595
Defendant Name	First: Robert	Middle:	Last: Mellow

2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 PA.C.S. §4904) relating to unsworn falsification to authorities.
4. This complaint is comprised of the preceding Page, as well as the attached pages that follow, numbered ____ through ____, specifying offenses and Participants, if any.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date)

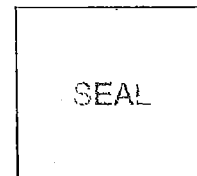
(Signature of Affiant)

AND NOW, on this date _____ I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

(Magisterial District Court Number)

(Issuing Authority)



**POLICE CRIMINAL COMPLAINT
ATTACHMENT**

Statute Description / Acts of the accused associated with this offense: 4

Bid-Rigging Unlawful
62 Pa.C.S.A. §4503(a)(1)

Grade – F3

On or about March 1, 2005 and dates thereafter, the Actor conspired, colluded or combined with another in order to commit or attempt to commit bid-rigging involving a contract for the purchase of equipment, goods, services or material or for construction or repair, namely bond underwriting agreements awarded to PNC Capital Markets, and/or its affiliates, let or to be let by a government agency, namely the Pennsylvania Turnpike Commission, in violation of Section 4503(a)(1) of the Pennsylvania Procurement Code, Antibid-Rigging Act of May 15, 1998, 62 Pa.C.S.A. §4503(a)(1).

Statute Description / Acts of the accused associated with this offense: 5

Restricted Activities
65 Pa.C.S.A. §1103(a)

Grade - F

On or about March 1, 2005 and dates thereafter, the Actor, a public official, engaged in conduct that constitutes a conflict of interest, namely the Actor used the authority of his office, the Senate of the Commonwealth of Pennsylvania, for the private pecuniary benefit of himself and/or others, namely, the Actor secured contracts for vendors and/or others doing work with the Pennsylvania Turnpike Commission in exchange for gifts, political support, and/or campaign contributions in violation of Section 1103(a) of the Pennsylvania Code of Public Officers, Public Employee Ethics Act of October 15, 1998, 65 Pa.C.S.A. §1103(a).

**POLICE CRIMINAL COMPLAINT
ATTACHMENT**

Statute Description / Acts of the accused associated with this offense: 6

Restricted Activities
65 Pa.C.S.A. §1103(c)

Grade - F

On or about March 1, 2005 and dates thereafter, the Actor, a public official, solicited or accepted anything of monetary value, including a gift, loan, political contribution, reward or promise of future employment, based on the understanding of the Actor that the vote, official action or judgment of the public official would be influenced thereby, namely the Actor accepted entertainment and/or gifts and/or political contributions from vendors and/or others doing work with the Pennsylvania Turnpike Commission and thereafter advocated on their behalf, in violation of Section 1103(c) of the Pennsylvania Code of Public Officers, Public Employee Ethics Act of October 15, 1998, 65 Pa.C.S.A. §1103(c).

Statute Description / Acts of the accused associated with this offense: 7

Criminal Conspiracy
18 Pa.C.S.A. §903(a)(1)

Grade - F1

On or about March 1, 2005 and dates thereafter, the Actor, with the intent of promoting or facilitating the commission of a crime, namely Corrupt Organizations, Commercial Bribery, and/or Bid-Rigging, agreed with other persons, namely Mitchell Rubin, Joseph Brimmeier, George Hatalowich, and/or others, that they or one or more of them would engage in conduct which constitutes such crimes or an attempt or solicitation to commit such crimes and engaged in an overt act in furtherance of said conspiracy, namely the Actor directed members of his staff and/or Joseph Brimmeier, and/or others associated with the Pennsylvania Turnpike Commission to perform campaign activities on his behalf and/or fundraise on his behalf and/or award contracts to vendors and/or others doing work with the Pennsylvania Turnpike Commission, in violation of Section 903(a)(1) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §903(a)(1).

**POLICE CRIMINAL COMPLAINT
ATTACHMENT**

Statute Description / Acts of the accused associated with this offense: 8

Failure to File Expense Account
25 P.S. §3545

Grade – M

On or about December 7, 2007 and dates thereafter, the Actor, a candidate, failed to file an account of primary or election expenses, as required by the Election Code, namely the Actor failed to report a campaign contribution and/or in kind contribution made by PNC Capital Markets and/or others for an event held during the Actor's contemplated Gubernatorial campaign, in violation of Section 3545 of the Election Code, Act of January 1, 1979, 25 P.S. § 3545.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DauphinMagisterial District Number: 12-3-03
MDJ: Hon. William Wenner
Address: 5925 Stevenson Avenue, Suite B
Harrisburg, PA 17112
Telephone: (717)545-0261POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

(NAME and ADDRESS):

Mitchell

Rubin

MR.

First Name

Middle Name

Last Name

Gen.

1608 Green Street, Philadelphia, PA 19130

NCIC Extradition Code Type

- | | | | |
|--|---|---|--|
| <input type="checkbox"/> 1-Felony Full | <input type="checkbox"/> 4-Felony No Ext. | <input type="checkbox"/> B-Misdemeanor Limited | <input type="checkbox"/> E-Misdemeanor Pending |
| <input type="checkbox"/> 2-Felony Ltd. | <input type="checkbox"/> 5-Felony Pend. | <input type="checkbox"/> C-Misdemeanor Surrounding States | |
| <input type="checkbox"/> 3-Felony Surrounding States | <input type="checkbox"/> A-Misdemeanor Full | <input type="checkbox"/> D-Misdemeanor No Extradition | |
| <input type="checkbox"/> Distance: _____ | | | |

DEFENDANT IDENTIFICATION INFORMATION

RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown	Docket Number DOB 02/03/1952 Add'l DOB / /	Date Filed / /	OTN/LiveScan Number	Complaint/Incident Number 36-595	
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female		POB S:		Add'l SSN - -		
SID:		HAIR COLOR <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> BLN (Blonde / Strawberry) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> WHI (White) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> SDY (Sandy)		EYE COLOR <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> MUL (Multicolored) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> XXX (Unknown)		
Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		Driver License State PA <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		License Number	Expires: / /	
DNA		DNA Location		WEIGHT (lbs.)		
FRI Number		MNU Number		Ft. HEIGHT in.		
Print Classification:						

DEFENDANT VEHICLE INFORMATION

Plate #	State	Hazmat <input type="checkbox"/>	Registration Sticker (MM/YY) /	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code
VIN	Year	Make	Model	Style	Color	

Office of the attorney for the Commonwealth ☒ Approved ☐ Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

DAG Laurel Brandstetter

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)3/13/2013
(Date)I, SA Robert M. Gift / Cpl. Leo D. Hannon Jr.
(Name of the Affiant)

#139 / #7865

(PSP/MPOETC -Assigned Affiant ID Number & Badge #)

of the PA Office of Attorney General/PA State Police

PA065015A

(Police Agency ORI Number)

(Identify Department or Agency Represented and Political Subdivision)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above☐ I accuse the defendant whose name is unknown to me but who is described as _____☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at []

(Subdivision Code) (Place-Political Subdivision)

in Dauphin County

[]
(County Code)

on or about March 1, 2005 and dates thereafter



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number 36-595
Defendant Name	First: Mitchell	Middle:	Last: Rubin

Acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate :
(Set forth a **brief** summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A
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<input type="checkbox"/>	1	911	(b)(3)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description/Acts of the accused associated with this Offense: 1

Corrupt Organizations

On or about March 1, 2005 and dates thereafter, the Actor, while employed by or associated with an enterprise, namely the Pennsylvania Turnpike Commission, did conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs, namely the award of contracts, through a pattern of racketeering activity, namely the Actor, as a principal and/or as an accomplice on multiple occasions, engaged in commercial bribery and/or violated a duty to act disinterestedly in the award of contracts by the Pennsylvania Turnpike Commission, in violation of Section 911(b)(3) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §911(b)(3).

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A
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<input type="checkbox"/>	2	911	(b)(4)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
-------------------------------------	------------------------	--	---	---

Statute Description/Acts of the accused associated with this Offense: 2

Corrupt Organizations

On or about March 1, 2005 and dates thereafter, the Actor, while employed by or associated with an enterprise, namely the Pennsylvania Turnpike Commission, did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a violations of 18 Pa.C.S.A. § 911(b)(3), that is, did conspire and agree with Robert Mellow, Joseph Brimmer, George Hatalowich, and/or others that they or one or more of them would conduct or participate, directly or indirectly, while employed by or associated with an enterprise engaged in commerce consisting of commercial bribery and breach of duty to act disinterestedly in the award of contracts, in the affairs of the said enterprise through a pattern of racketeering activity as defined in Title 18 Pa.C.S.A. §911(h)(1), in violation of Section 911(b)(4) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §911(b)(4).

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A
--	---	--	--	--	--	--	---

<input type="checkbox"/>	3	4108	(b)	of the	18	1	M2		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description/Acts of the accused associated with this Offense: 3

Commercial Bribery

On or about March 1, 2005 and dates thereafter, the Actor, who holds himself out to the public as being engaged in the business of making disinterested selection, appraisal, or criticism of commodities or services, namely the award of contracts, agreements, leases, and/or work orders with the Pennsylvania Turnpike Commission, solicited, accepted, or agreed to accept any benefit to influence his selection, appraisal, or criticism, namely campaign contributions and/or political benefit and/or continued employment and/or gifts and/or entertainment and/or travel and/or any other benefit, in violation of Section 4108(b) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §4108(b).



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number 36-595
Defendant Name	First: Mitchell	Middle:	Last: Rubin

2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 PA.C.S. §4904) relating to unsworn falsification to authorities.
4. This complaint is comprised of the preceding Page, as well as the attached pages that follow, numbered ____ through ____, specifying offenses and Participants, if any.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date)

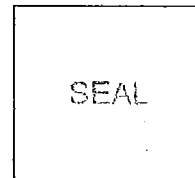
(Signature of Affiant)

AND NOW, on this date _____ I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

(Magisterial District Court Number)

(Issuing Authority)



**POLICE CRIMINAL COMPLAINT
ATTACHMENT**

Statute Description / Acts of the accused associated with this offense: 4

Bid-Rigging Unlawful
62 Pa.C.S.A. §4503(a)(1)

Grade – F3

On or about March 1, 2005 and dates thereafter, the Actor conspired, colluded or combined with another in order to commit or attempt to commit bid-rigging involving a contract for the purchase of equipment, goods, services or material or for construction or repair, namely the 2005 and 2008 contracts and contract increases awarded to Ciber, let or to be let by a government agency, namely the Pennsylvania Turnpike Commission, in violation of Section 4503(a)(1) of the Pennsylvania Procurement Code, Antbid-Rigging Act of May 15, 1998, 62 Pa.C.S.A. §4503(a)(1).

Statute Description / Acts of the accused associated with this offense: 5

Bid-Rigging Unlawful
62 Pa.C.S.A. §4503(a)(1)

Grade – F3

On or about March 1, 2005 and dates thereafter, the Actor conspired, colluded or combined with another in order to commit or attempt to commit bid-rigging involving a contract for the purchase of equipment, goods, services or material or for construction or repair, namely bond underwriting agreements awarded to PNC Capital Markets, and/or its affiliates, let or to be let by a government agency, namely the Pennsylvania Turnpike Commission, in violation of Section 4503(a)(1) of the Pennsylvania Procurement Code, Antbid-Rigging Act of May 15, 1998, 62 Pa.C.S.A. §4503(a)(1).

Statute Description / Acts of the accused associated with this offense: 6

Bid-Rigging Unlawful
62 Pa.C.S.A. §4503(a)(1)

Grade – F3

On or about March 1, 2005 and dates thereafter, the Actor conspired, colluded or combined with another in order to commit or attempt to commit bid-rigging involving a contract for the purchase of equipment, goods, services or material or for construction or repair, namely contracts and/or agreements awarded to City Line Abstract Company, let or to be let by a government agency, namely the Pennsylvania Turnpike Commission, in violation of Section 4503(a)(1) of the Pennsylvania Procurement Code, Antbid-Rigging Act of May 15, 1998, 62 Pa.C.S.A. §4503(a)(1).

**POLICE CRIMINAL COMPLAINT
ATTACHMENT**

Statute Description / Acts of the accused associated with this offense: 7

Restricted Activities
65 Pa.C.S.A. §1103(a)

Grade - F

On or about March 1, 2005 and dates thereafter, the Actor, a public official, engaged in conduct that constitutes a conflict of interest, namely the Actor used the authority of his office, Chairman of the Pennsylvania Turnpike Commission, for the private pecuniary benefit of himself and/or others, namely, the Actor secured contracts for vendors and/or others doing work with the Pennsylvania Turnpike Commission in exchange for gifts, entertainment, travel, political support, and/or campaign contributions in violation of Section 1103(a) of the Pennsylvania Code of Public Officers, Public Employee Ethics Act of October 15, 1998, 65 Pa.C.S.A. §1103(a).

Statute Description / Acts of the accused associated with this offense: 8

Restricted Activities
65 Pa.C.S.A. §1103(c)

Grade - F

On or about March 1, 2005 and dates thereafter, the Actor, a public official, solicited or accepted anything of monetary value, including a gift, loan, political contribution, reward or promise of future employment, based on the understanding of the Actor that the vote, official action or judgment of the public official would be influenced thereby, namely the Actor accepted payment and/or entertainment and/or gifts and/or political contributions from vendors and/or others doing work with the Pennsylvania Turnpike Commission and thereafter advocated on their behalf, in violation of Section 1103(c) of the Pennsylvania Code of Public Officers, Public Employee Ethics Act of October 15, 1998, 65 Pa.C.S.A. §1103(c).

**POLICE CRIMINAL COMPLAINT
ATTACHMENT**

Statute Description / Acts of the accused associated with this offense: 9

Criminal Conspiracy
18 Pa.C.S.A. §903(a)(1)

Grade – F1

On or about March 1, 2005 and dates thereafter, the Actor, with the intent of promoting or facilitating the commission of a crime, namely Corrupt Organizations, Commercial Bribery, and/or Bid-Rigging, agreed with other persons, namely Robert Mellow, Joseph Brimmeier, George Hatalowich, and/or others, that they or one or more of them would engage in conduct which constitutes such crimes or an attempt or solicitation to commit such crimes and engaged in an overt act in furtherance of said conspiracy, namely the Actor directed George Hatalowich and/or Joseph Brimmeier and/or others associated with the Pennsylvania Turnpike Commission to perform campaign activities and/or conduct political fundraising activities and/or engaged in activity to determine in advance the winning bidder of contracts and/or contract increases with the Pennsylvania Turnpike Commission, in violation of Section 903(a)(1) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §903(a)(1).

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: Dauphin

Magisterial District Number: 12-3-03
MDJ: Hon. William Wenner
Address: 5925 Stevenson Avenue, Suite B
Harrisburg, PA 17112
Telephone: (717)545-0261



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

(NAME and ADDRESS):

Joseph

Brimmeier

MR.

First Name

Middle Name

Last Name

Gen.

141 Renfer Street, Pittsburgh, PA 15237

NCIC Extradition Code Type

- ☐ 1-Felony Full ☐ 4-Felony No Ext. ☐ B-Misdemeanor Limited ☐ E-Misdemeanor Pending
☐ 2-Felony Ltd. ☐ 5-Felony Pend. ☐ C-Misdemeanor Surrounding States
☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ D-Misdemeanor No Extradition
☐ Distance: _____

DEFENDANT IDENTIFICATION INFORMATION

RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown	Docket Number DOB 04/01/1948 Add'l DOB / /	Date Filed / /	OTN/LiveScan Number	Complaint/Incident Number 36-595
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female		POB S	Add'l SSN - -		
First Name AKA		Middle Name	Last Name	Gen.	

SID:	HAIR COLOR <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> SDY (Sandy)	EYE COLOR <input type="checkbox"/> BLN (Blonde / Strawberry) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> SDY (Sandy)
-------------	--	--

Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Driver License State PA <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	License Number	Expires: / /	WEIGHT (lbs.)
DNA	DNA Location	MNU Number	Ft. HEIGHT In.	
FRI Number	Arrest Classification:			

DEFENDANT VEHICLE INFORMATION

Plate #	State	Hazmat <input type="checkbox"/>	Registration Sticker (MM/YY) /	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code
VIN	Year	Make	Model	Style	Color	

Office of the attorney for the Commonwealth ☒ Approved ☐ Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

DAG Laurel Brandstetter

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

3/13/2013
(Date)

I, SA Robert M. Gift / Cpl. Leo D. Hannon Jr. (Name of the Affiant)	#139 / #7865 (PSP/MPOETC -Assigned Affiant ID Number & Badge #)
of the PA Office of Attorney General/PA State Police (Identify Department or Agency Represented and Political Subdivision)	PA065015A (Police Agency ORI Number)
do hereby state: (check appropriate box)	
1. <input checked="" type="checkbox"/> I accuse the above named defendant who lives at the address set forth above <input type="checkbox"/> I accuse the defendant whose name is unknown to me but who is described as _____	
<input type="checkbox"/> I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [] (Subdivision Code) (Place-Political Subdivision)	
in Dauphin County [] on or about March 1, 2005 and dates thereafter (County Code)	



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number 36-595
Defendant Name:	First: Joseph	Middle:	Last: Brimmeyer

Acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate :

(Set forth a **brief** summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A
---	--	---	---	---	---	---	--

<input type="checkbox"/> Lead?	1	911	(b)(3)	of the	18	1	F1		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
---------------------------------	--------------------	--	--------------------------------------	------------------------------------

Statute Description/Acts of the accused associated with this Offense: 1

Corrupt Organizations

On or about March 1, 2005 and dates thereafter, the Actor, while employed by or associated with an enterprise, namely the Pennsylvania Turnpike Commission, did conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs, namely the award of contracts, through a pattern of racketeering activity, namely the Actor, as a principal and/or as an accomplice on multiple occasions, engaged in commercial bribery and/or violated a duty to act disinterestedly in the award of contracts by the Pennsylvania Turnpike Commission, in violation of Section 911(b)(3) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §911(b)(3).

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A
---	--	---	---	---	---	---	--

<input type="checkbox"/> Lead?	2	911	(b)(4)	of the	18	1	F1		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
---------------------------------	--------------------	--	--------------------------------------	------------------------------------

Statute Description/Acts of the accused associated with this Offense: 2

Corrupt Organizations

On or about March 1, 2005 and dates thereafter, the Actor, while employed by or associated with an enterprise, namely the Pennsylvania Turnpike Commission, did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a violations of 18 Pa.C.S.A. § 911(b)(3), that is, did conspire and agree with Robert Mellow, Mitchell Rubin, George Hatalowich, and/or others that they or one or more of them would conduct or participate, directly or indirectly, while employed by or associated with an enterprise engaged in commerce consisting of commercial bribery and breach of duty to act disinterestedly in the award of contracts, in the affairs of the said enterprise through a pattern of racketeering activity as defined in Title 18 Pa.C.S.A. §911(h)(1), in violation of Section 911(b)(4) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §911(b)(4).

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A
---	--	---	---	---	---	---	--

<input type="checkbox"/> Lead?	3	4108	(b)	of the	18	1	M2		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
---------------------------------	--------------------	--	--------------------------------------	------------------------------------

Statute Description/Acts of the accused associated with this Offense: 3

Commercial Bribery

On or about March 1, 2005 and dates thereafter, the Actor, who holds himself out to the public as being engaged in the business of making disinterested selection, appraisal, or criticism of commodities or services, namely the award of contracts, agreements, leases, and/or work orders with the Pennsylvania Turnpike Commission, solicited, accepted, or agreed to accept any benefit to influence his selection, appraisal, or criticism, namely campaign contributions and/or political benefit and/or continued employment and/or gifts and/or entertainment and/or travel and/or any other benefit, in violation of Section 4108(b) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §4108(b).



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number 36-595
Defendant Name	First: Joseph	Middle:	Last: Brimmeier

2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 PA.C.S. §4904) relating to unsworn falsification to authorities.
4. This complaint is comprised of the preceding Page, as well as the attached pages that follow, numbered ____ through ____, specifying offenses and Participants, if any.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date)

(Signature of Affiant)

AND NOW, on this date _____ I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

(Magisterial District Court Number)

(Issuing Authority)

SEAL

**POLICE CRIMINAL COMPLAINT
ATTACHMENT**

Statute Description / Acts of the accused associated with this offense: 4

Bid-Rigging Unlawful
62 Pa.C.S.A. §4503(a)(1)

Grade – F3

On or about March 1, 2005 and dates thereafter, the Actor conspired, colluded or combined with another in order to commit or attempt to commit bid-rigging involving a contract for the purchase of equipment, goods, services or material or for construction or repair, namely contracts and contract increases awarded to Orth-Rodgers & Associates, Inc. for the design and construction of the Fog Detection, Traveler Information, and Dynamic Traffic Control system, let or to be let by a government agency, namely the Pennsylvania Turnpike Commission, in violation of Section 4503(a)(1) of the Pennsylvania Procurement Code, Antibid-Rigging Act of May 15, 1998, 62 Pa.C.S.A. §4503(a)(1).

Statute Description / Acts of the accused associated with this offense: 5

Bid-Rigging Unlawful
62 Pa.C.S.A. §4503(a)(1)

Grade – F3

On or about March 1, 2005 and dates thereafter, the Actor conspired, colluded or combined with another in order to commit or attempt to commit bid-rigging involving a contract for the purchase of equipment, goods, services or material or for construction or repair, namely a digital video auditing system, let or to be let by a government agency, namely the Pennsylvania Turnpike Commission, in violation of Section 4503(a)(1) of the Pennsylvania Procurement Code, Antibid-Rigging Act of May 15, 1998, 62 Pa.C.S.A. §4503(a)(1).

**POLICE CRIMINAL COMPLAINT
ATTACHMENT**

Statute Description / Acts of the accused associated with this offense: 6

Criminal Attempt
18 Pa.C.S.A. §901(a)

Grade – M2

On or about March 1, 2005 and dates thereafter, the Actor attempted with the intent to commit a specific crime, namely Commercial Bribery, an act which constituted a substantial step toward the commission of that crime, namely the Actor directed employees of the Pennsylvania Turnpike Commission to alter evaluations of potential vendors competing for a digital video auditing system and/or otherwise failed to act disinterestedly, in violation of Section 901(a) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A §901(a).

Statute Description / Acts of the accused associated with this offense: 7

Restricted Activities
65 Pa.C.S.A. §1103(a)

Grade - F

On or about March 1, 2005 and dates thereafter, the Actor, a public official, engaged in conduct that constitutes a conflict of interest, namely the Actor used the authority of his office, Chief Executive Officer of the Pennsylvania Turnpike Commission, for the private pecuniary benefit of himself and/or others, namely, the Actor secured contracts for vendors and/or others doing work with the Pennsylvania Turnpike Commission in exchange for political support, a sub-contract for his sister, Jan Brimmeier and/or campaign contributions in violation of Section 1103(a) of the Pennsylvania Code of Public Officers, Public Employee Ethics Act of October 15, 1998, 65 Pa.C.S.A. §1103(a).

**POLICE CRIMINAL COMPLAINT
ATTACHMENT**

Statute Description / Acts of the accused associated with this offense: 8

Restricted Activities
65 Pa.C.S.A. §1103(c)

Grade - F

On or about March 1, 2005 and dates thereafter, the Actor, a public official, solicited or accepted anything of monetary value, including a gift, loan, political contribution, reward or promise of future employment, based on the understanding of the Actor that the vote, official action or judgment of the public official would be influenced thereby, namely the Actor accepted political contributions from vendors and/or others doing work with the Pennsylvania Turnpike Commission and thereafter advocated on their behalf, in violation of Section 1103(c) of the Pennsylvania Code of Public Officers, Public Employee Ethics Act of October 15, 1998, 65 Pa.C.S.A. §1103(c).

Statute Description / Acts of the accused associated with this offense: 9

Criminal Conspiracy
18 Pa.C.S.A. §903(a)(1)

Grade – F1

On or about March 1, 2005 and dates thereafter, the Actor, with the intent of promoting or facilitating the commission of a crime, namely Corrupt Organizations, Commercial Bribery, and/or Bid-Rigging, agreed with other persons, namely Robert Mellow, Mitchell Rubin, George Hatalowich, and/or others, that they or one or more of them would engage in conduct which constitutes such crimes or an attempt or solicitation to commit such crimes and engaged in an overt act in furtherance of said conspiracy, namely the Actor directed George Hatalowich and/or others associated with the Pennsylvania Turnpike Commission to perform campaign activities and/or conduct political fundraising and/or engaged in activity to determine in advance the winning bidder of contracts and/or contract increases with the Pennsylvania Turnpike Commission, in violation of Section 903(a)(1) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §903(a)(1).

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: Dauphin

Magisterial District Number: 12-3-03
MDJ: Hon. William Wenner
Address: 5925 Stevenson Avenue, Suite B
Harrisburg, PA 17112
Telephone: (717)545-0261



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

(NAME and ADDRESS):

George

Hatalowich

MR.

First Name

Middle Name

Last Name

Gen.

224 Tiverton Lane, Harrisburg, PA 17112

NCIC Extradition Code Type

- ☐ 1-Felony Full ☐ 4-Felony No Ext. ☐ B-Misdemeanor Limited ☐ E-Misdemeanor Pending
☐ 2-Felony Ltd. ☐ 5-Felony Pend. ☐ C-Misdemeanor Surrounding States
☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ D-Misdemeanor No Extradition
☐ Distance: _____

DEFENDANT IDENTIFICATION INFORMATION

RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown	Docket Number DOB 10/19/1965 Add'l DOB / /	Date Filed / / POB	OTN/LiveScan Number	Complaint/Incident Number 36-595
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female		First Name	Middle Name	Last Name	Gen.
SID:		HAIR COLOR <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> SDY (Sandy)			
Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		EYE COLOR <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> MUL (Multicolored) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> XXX (Unknown)			
Driver License	State PA	License Number	Expires: / /	WEIGHT (lbs.)	
DNA	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	DNA Location			
FPI Number		MNU Number	Ft. HEIGHT in.		
Fingerprint Classification:					

DEFENDANT VEHICLE INFORMATION

Plate #	State	Hazmat <input type="checkbox"/>	Registration Sticker (MM/YY)	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code
VIN	Year	Make	Model	Style	Color	

Office of the attorney for the Commonwealth ☒ Approved ☐ Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

DAG Laurel Brandstetter

(Name of the attorney for the Commonwealth)

Laurel Brandstetter
(Signature of the attorney for the Commonwealth)

3/13/2005
(Date)

I, SA Robert M. Gift / Cpl. Leo D. Hannon Jr.

#139 / #7865

(Name of the Affiant)

(PSP/MPOTC -Assigned Affiant ID Number & Badge #

of the PA Office of Attorney General/PA State Police

PA065015A

(Identify Department or Agency Represented and Political Subdivision)

(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above

☐ I accuse the defendant whose name is unknown to me but who is described as _____

☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at []

(Subdivision Code) (Place-Political Subdivision)

in Dauphin County

[]

on or about March 1, 2005 and dates thereafter

(County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number 36-595
Defendant Name	First: George	Middle:	Last: Hatalowich

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate :
(Set forth a **brief** summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A
<input type="checkbox"/>	1	911	(b)(3)	of the	18	1	F1
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description/Acts of the accused associated with this Offense: 1

Corrupt Organizations

On or about March 1, 2005 and dates thereafter, the Actor, while employed by or associated with an enterprise, namely the Pennsylvania Turnpike Commission, did conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs, namely the award of contracts, through a pattern of racketeering activity, namely the Actor, as a principal and/or as an accomplice on multiple occasions, engaged in commercial bribery and/or violated a duty to act disinterestedly in the award of contracts by the Pennsylvania Turnpike Commission, in violation of Section 911(b)(3) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §911(b)(3).

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A
<input type="checkbox"/>	2	911	(b)(4)	of the	18	1	F1
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description/Acts of the accused associated with this Offense: 2

Corrupt Organizations

On or about March 1, 2005 and dates thereafter, the Actor, while employed by or associated with an enterprise, namely the Pennsylvania Turnpike Commission, did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a violations of 18 Pa.C.S.A. § 911(b)(3), that is, did conspire and agree with Robert Mellow, Mitchell Rubin, Joseph Brimmeler, and/or others that they or one or more of them would conduct or participate, directly or indirectly, while employed by or associated with an enterprise engaged in commerce consisting of commercial bribery and breach of duty to act disinterestedly in the award of contracts, in the affairs of the said enterprise through a pattern of racketeering activity as defined in Title 18 Pa.C.S.A. §911(h)(1), in violation of Section 911(b)(4) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §911(b)(4).

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A
<input type="checkbox"/>	3	4108	(b)	of the	18	1	M2
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description/Acts of the accused associated with this Offense: 3

Commercial Bribery

On or about March 1, 2005 and dates thereafter, the Actor, who holds himself out to the public as being engaged in the business of making disinterested selection, appraisal, or criticism of commodities or services, namely the award of contracts, agreements, leases, and/or work orders with the Pennsylvania Turnpike Commission, solicited, accepted, or agreed to accept any benefit to influence his selection, appraisal, or criticism, namely campaign contributions and/or political benefit and/or continued employment and/or gifts and/or entertainment and/or travel and/or any other benefit, in violation of Section 4108(b) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §4108(b).



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number 36-595
Defendant Name	First: George	Middle:	Last: Hatalowich

2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 PA.C.S.§4904) relating to unsworn falsification to authorities.
4. This complaint is comprised of the preceding Page, as well as the attached pages that follow, numbered ____ through ____, specifying offenses and Participants, if any.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date)

(Signature of Affiant)

AND NOW, on this date _____, I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

(Magisterial District Court Number)

(Issuing Authority)

SEAL

**POLICE CRIMINAL COMPLAINT
ATTACHMENT**

Statute Description / Acts of the accused associated with this offense: 4

Bid-Rigging Unlawful
62 Pa.C.S.A. §4503(a)(1)

Grade – F3

On or about March 1, 2005 and dates thereafter, the Actor conspired, colluded or combined with another in order to commit or attempt to commit bid-rigging involving a contract for the purchase of equipment, goods, services or material or for construction or repair, namely the 2005 and 2008 contracts and contract increases awarded to Ciber, let or to be let by a government agency, namely the Pennsylvania Turnpike Commission, in violation of Section 4503(a)(1) of the Pennsylvania Procurement Code, Antibid-Rigging Act of May 15, 1998, 62 Pa.C.S.A. §4503(a)(1).

Statute Description / Acts of the accused associated with this offense: 5

Bid-Rigging Unlawful
62 Pa.C.S.A. §4503(a)(1)

Grade – F3

On or about March 1, 2005 and dates thereafter, the Actor conspired, colluded or combined with another in order to commit or attempt to commit bid-rigging involving a contract for the purchase of equipment, goods, services or material or for construction or repair, namely contracts awarded to McTish, Kunkle & Associates, let or to be let by a government agency, namely the Pennsylvania Turnpike Commission, in violation of Section 4503(a)(1) of the Pennsylvania Procurement Code, Antibid-Rigging Act of May 15, 1998, 62 Pa.C.S.A. §4503(a)(1).

Statute Description / Acts of the accused associated with this offense: 6

Bid-Rigging Unlawful
62 Pa.C.S.A. §4503(a)(1)

Grade – F3

On or about March 1, 2005 and dates thereafter, the Actor conspired, colluded or combined with another in order to commit or attempt to commit bid-rigging involving a contract for the purchase of equipment, goods, services or material or for construction or repair, namely a digital video auditing system, let or to be let by a government agency, namely the Pennsylvania Turnpike Commission, in violation of Section 4503(a)(1) of the Pennsylvania Procurement Code, Antibid-Rigging Act of May 15, 1998, 62 Pa.C.S.A. §4503(a)(1).

**POLICE CRIMINAL COMPLAINT
ATTACHMENT**

Statute Description / Acts of the accused associated with this offense: 7

Criminal Attempt
18 Pa.C.S.A. §901(a)

Grade – M2

On or about March 1, 2005 and dates thereafter, the Actor attempted with the intent to commit a specific crime, namely Commercial Bribery, an act which constituted a substantial step toward the commission of that crime, namely the Actor directed employees of the Pennsylvania Turnpike Commission to alter evaluations of potential vendors competing for a digital video auditing system and/or otherwise failed to act disinterestedly, in violation of Section 901(a) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A §901(a).

Statute Description / Acts of the accused associated with this offense: 8

Restricted Activities
65 Pa.C.S.A. §1103(a)

Grade - F

On or about March 1, 2005 and dates thereafter, the Actor, a public official, engaged in conduct that constitutes a conflict of interest, namely the Actor used the authority of his office, Contracts Administrator and/or Chief Operating Officer of the Pennsylvania Turnpike Commission, for the private pecuniary benefit of himself and/or others, namely, the Actor secured contracts for vendors and/or others doing work with the Pennsylvania Turnpike Commission in exchange for political support, a sub-contract for Chief Executive Officer Joseph Brimmeier's sister, Jan Brimmeier and/or campaign contributions in violation of Section 1103(a) of the Pennsylvania Code of Public Officers, Public Employee Ethics Act of October 15, 1998, 65 Pa.C.S.A. §1103(a).

Statute Description / Acts of the accused associated with this offense: 9

Restricted Activities
65 Pa.C.S.A. §1103(a)

Grade - F

On or about March 1, 2005 and dates thereafter, the Actor, a public official, engaged in conduct that constitutes a conflict of interest, namely the Actor used the authority of his office, Contracts Administrator and/or Chief Operating Officer of the Pennsylvania Turnpike Commission, for the private pecuniary benefit of himself and/or others, namely, the Actor accepted entertainment and/or gifts provided by Orth-Rodgers & Associates, Inc., a contractor with the Pennsylvania Turnpike Commission in violation of Section 1103(a) of the Pennsylvania Code of Public Officers, Public Employee Ethics Act of October 15, 1998, 65 Pa.C.S.A. §1103(a).

**POLICE CRIMINAL COMPLAINT
ATTACHMENT**

Statute Description / Acts of the accused associated with this offense: 10

Restricted Activities
65 Pa.C.S.A. §1103(a)

Grade - F

On or about March 1, 2005 and dates thereafter, the Actor, a public official, engaged in conduct that constitutes a conflict of interest, namely the Actor used the authority of his office, Contracts Administrator and/or Chief Operating Officer of the Pennsylvania Turnpike Commission, for the private pecuniary benefit of himself and/or others, namely, the Actor accepted entertainment and/or gifts provided by McTish, Kunkle & Associates, a contractor with the Pennsylvania Turnpike Commission in violation of Section 1103(a) of the Pennsylvania Code of Public Officers, Public Employee Ethics Act of October 15, 1998, 65 Pa.C.S.A. §1103(a).

Statute Description / Acts of the accused associated with this offense: 11

Restricted Activities
65 Pa.C.S.A. §1103(a)

Grade - F

On or about March 1, 2005 and dates thereafter, the Actor, a public official, engaged in conduct that constitutes a conflict of interest, namely the Actor used the authority of his office, Contracts Administrator and/or Chief Operating Officer of the Pennsylvania Turnpike Commission, for the private pecuniary benefit of himself and/or others, namely, the Actor accepted entertainment and/or gifts provided by Sucevic, Piccolomini & Kuchar Engineering, Inc., a contractor with the Pennsylvania Turnpike Commission in violation of Section 1103(a) of the Pennsylvania Code of Public Officers, Public Employee Ethics Act of October 15, 1998, 65 Pa.C.S.A. §1103(a).

**POLICE CRIMINAL COMPLAINT
ATTACHMENT**

Statute Description / Acts of the accused associated with this offense: 12

Restricted Activities
65 Pa.C.S.A. §1103(a)

Grade - F

On or about March 1, 2005 and dates thereafter, the Actor, a public official, engaged in conduct that constitutes a conflict of interest, namely the Actor used the authority of his office, Contracts Administrator and/or Chief Operating Officer of the Pennsylvania Turnpike Commission, for the private pecuniary benefit of himself and/or others, namely, the Actor accepted entertainment and/or gifts provided by Wilbur Smith & Associates, a contractor with the Pennsylvania Turnpike Commission in violation of Section 1103(a) of the Pennsylvania Code of Public Officers, Public Employee Ethics Act of October 15, 1998, 65 Pa.C.S.A. §1103(a).

Statute Description / Acts of the accused associated with this offense: 13

Restricted Activities
65 Pa.C.S.A. §1103(a)

Grade - F

On or about March 1, 2005 and dates thereafter, the Actor, a public official, engaged in conduct that constitutes a conflict of interest, namely the Actor used the authority of his office, Contracts Administrator and/or Chief Operating Officer of the Pennsylvania Turnpike Commission, for the private pecuniary benefit of himself and/or others, namely, the Actor accepted entertainment and/or gifts provided by Jeffrey Suzenski, an advocate for a contractor with the Pennsylvania Turnpike Commission in violation of Section 1103(a) of the Pennsylvania Code of Public Officers, Public Employee Ethics Act of October 15, 1998, 65 Pa.C.S.A. §1103(a).

**POLICE CRIMINAL COMPLAINT
ATTACHMENT**

Statute Description / Acts of the accused associated with this offense: 14

Restricted Activities
65 Pa.C.S.A. §1103(c)

Grade - F

On or about March 1, 2005 and dates thereafter, the Actor, a public official, solicited or accepted anything of monetary value, including a gift, loan, political contribution, reward or promise of future employment, based on the understanding of the Actor that the vote, official action or judgment of the public official would be influenced thereby, namely the Actor accepted political contributions, gifts, entertainment, and travel from vendors and/or others doing work with the Pennsylvania Turnpike Commission and thereafter advocated on their behalf, in violation of Section 1103(c) of the Pennsylvania Code of Public Officers, Public Employee Ethics Act of October 15, 1998, 65 Pa.C.S.A. §1103(c).

Statute Description / Acts of the accused associated with this offense: 15

Criminal Conspiracy
18 Pa.C.S.A. §903(a)(1)

Grade – F1

On or about March 1, 2005 and dates thereafter, the Actor, with the intent of promoting or facilitating the commission of a crime, namely Corrupt Organizations, Commercial Bribery, and/or Bid-Rigging, agreed with other persons, namely Robert Mellow, Mitchell Rubin, Joseph Brimmeier, and/or others, that they or one or more of them would engage in conduct which constitutes such crimes or an attempt or solicitation to commit such crimes and engaged in an overt act in furtherance of said conspiracy, namely the Actor directed employees of the Pennsylvania Turnpike Commission to perform campaign activities and/or conduct political fundraising and/or and/or engaged in activity to determine in advance the winning bidder of contracts and/or contract increases with the Pennsylvania Turnpike Commission, in violation of Section 903(a)(1) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §903(a)(1).

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: Dauphin

Magisterial District Number: 12-3-03

MDJ: Hon. William Wenner

Address: 5925 Stevenson Avenue, Suite B
Harrisburg, PA 17112

Telephone: (717)545-0261



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

(NAME and ADDRESS):

Dennis

Miller

MR.

First Name

Middle Name

Last Name

Gen.

1626 Whitley Drive, Harrisburg, PA 17111

NCIC Extradition Code Type

- ☐ 1-Felony Full ☐ 4-Felony No Ext. ☐ B-Misdemeanor Limited ☐ E-Misdemeanor Pending
☐ 2-Felony Ltd. ☐ 5-Felony Pend. ☐ C-Misdemeanor Surrounding States
☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ D-Misdemeanor No Extradition
☐ Distance: _____

DEFENDANT IDENTIFICATION INFORMATION

RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown	Docket Number	Date Filed / /	OTN/LiveScan Number	Complaint/Incident Number 36-595
		DOB 09/15/1961		POB	
		Add'l DOB / /		SSN	Add'l SSN - -
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female		First Name	Middle Name	Last Name	Gen.
AKA					

SID:	HAIR COLOR <input checked="" type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.)	EYE COLOR
Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	<input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> BLN (Blonde / Strawberry) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> WHI (White) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> SDY (Sandy)	<input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> MUL (Multicolored) <input checked="" type="checkbox"/> BLU (Blue) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> XXX (Unknown) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> MAR (Maroon)

Driver License	State PA	License Number	Expires: / /	WEIGHT (lbs.)
DNA	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	DNA Location		
FBI Number		MNU Number		
Fingerprint Classification:				

DEFENDANT VEHICLE INFORMATION

Plate #	State	Hazmat <input type="checkbox"/>	Registration Sticker (MM/YY) /	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code
VIN	Year	Make	Model	Style	Color	

Office of the attorney for the Commonwealth ☒ Approved ☐ Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

DAG Laurel Brandstetter

(Name of the attorney for the Commonwealth)

Laurel Brandstetter
(Signature of the attorney for the Commonwealth)

3/13/2013
(Date)

I, SA Robert M. Gift / Cpl. Leo D. Hannon Jr.

#139 / #7865

(Name of the Affiant)

(PSP/MPOETC -Assigned Affiant ID Number & Badge #

Of the PA Office of Attorney General/PA State Police

PA065015A

(Identify Department or Agency Represented and Political Subdivision)

(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above
☐ I accuse the defendant whose name is unknown to me but who is described as _____

☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at []
 (Subdivision Code) (Place-Political Subdivision)

in Dauphin County [] on or about March 1, 2005 and dates thereafter
 (County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number 36-595
Defendant Name	First: Dennis	Middle:	Last: Miller

acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate :

(Set forth a **brief** summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A
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<input type="checkbox"/> Lead?	Offense# 1	Section 4503	Subsection (a)(1)	PA Statute (Title) of the	Counts 62	Grade 1	NCIC Offense Code F3	UCR/NIBRS Code
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PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description/Acts of the accused associated with this Offense: 1

Bid-Rigging Unlawful

On or about March 1, 2005 and dates thereafter, the Actor conspired, colluded or combined with another in order to commit or attempt to commit bid-rigging involving a contract for the purchase of equipment, goods, services or material or for construction or repair, namely the 2005 and 2008 contracts and contract increases awarded to Ciber, let or to be let by a government agency, namely the Pennsylvania Turnpike Commission, in violation of Section 4503(a)(1) of the Pennsylvania Procurement Code, Antbid-Rigging Act of May 15, 1998, 62 Pa.C.S.A. §4503(a)(1).

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A
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<input type="checkbox"/> Lead?	Offense# 2	Section 3921	Subsection (a)	PA Statute (Title) of the	Counts 18	Grade 1	NCIC Offense Code F3	UCR/NIBRS Code
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PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description/Acts of the accused associated with this Offense: 2

Theft by Unlawful Taking

On or about March 1, 2005 and dates thereafter, the Actor, unlawfully took or exercised unlawful control over moveable property of another, namely, commissions and bonuses in excess of \$2,000.00 belonging to Ciber, with the intent to deprive the owner thereof, namely the Actor used the authority of his position to fabricate work and/or overbill and/or otherwise increase invoice costs to the Pennsylvania Turnpike Commission thereby increasing his commissions and/or bonuses, in violation of Section 3921(a) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §3921(a).

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A
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<input type="checkbox"/> Lead?	Offense# 3	Section 3922	Subsection (a)(1)	PA Statute (Title) of the	Counts 18	Grade 1	NCIC Offense Code F3	UCR/NIBRS Code
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PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description/Acts of the accused associated with this Offense: 3

Theft by Deception

On or about March 1, 2005 and dates thereafter, the Actor intentionally obtained or withheld property, namely commissions and bonuses in excess of \$2,000.00, by creating a false impression that he would properly and accurately bill the Pennsylvania Turnpike Commission for work performed and necessary services rendered, in violation of Section 3922(a)(1) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. § 3922(a)(1).



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number 36-595
Defendant Name	First: Dennis	Middle:	Last: Miller

2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 PA.C.S. §4904) relating to unsworn falsification to authorities.
4. This complaint is comprised of the preceding Page, as well as the attached pages that follow, numbered ____ through ____, specifying offenses and Participants, if any.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date)

(Signature of Affiant)

AND NOW, on this date _____ I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

(Magisterial District Court Number)

(Issuing Authority)

SEAL

**POLICE CRIMINAL COMPLAINT
ATTACHMENT**

Statute Description / Acts of the accused associated with this offense: 4

Restricted Activities
65 Pa.C.S.A. §1103(b)

Grade - F

On or about March 1, 2005 and dates thereafter, the Actor, offered or gave to a public official or public employee, namely George Hatalowich and/or others employed by or associated with the Pennsylvania Turnpike Commission, anything of monetary value, including a gift, loan, political contribution, reward or promise of future employment based on the offeror's or donor's understanding that the vote, official action or judgment of the public official or public employee would be influenced thereby, in violation of Section 1103(b) of the Pennsylvania Code of Public Officers, Public Employee Ethics Act of October 15, 1998, 65 Pa.C.S.A. §1103(b).

Statute Description / Acts of the accused associated with this offense: 5

Criminal Conspiracy
18 Pa.C.S.A. §903(a)(1)

Grade – F3

On or about March 1, 2005 and dates thereafter, the Actor, with the intent of promoting or facilitating the commission of a crime, namely Commercial Bribery, and/or Bid-Rigging, agreed with other persons, namely Mitchell Rubin, Joseph Brimmeier, George Hatalowich and/or others, that they or one or more of them would engage in conduct which constitutes such crimes or an attempt or solicitation to commit such crimes and engaged in an overt act in furtherance of said conspiracy, namely the Actor directed employees of Ciber and/or employees of the Pennsylvania Turnpike Commission to perform campaign activities and/or conduct political fundraising and/or engaged in activity to determine in advance the winning bidder of contracts and/or contract increases with the Pennsylvania Turnpike Commission, in violation of Section 903(a)(1) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §903(a)(1).

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: Dauphin

Magisterial District Number: 12-3-03
MDJ: Hon. William Wenner
Address: 5925 Stevenson Avenue, Suite B
Harrisburg, PA 17112
Telephone: (717)545-0261



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

(NAME and ADDRESS):

Jeffrey

Suzenski

MR.

First Name

Middle Name

Last Name

Gen.

2193 Saint Peters Road, Pottstown, PA 19465

NCIC Extradition Code Type

- ☐ 1-Felony Full ☐ 4-Felony No Ext. ☐ B-Misdemeanor Limited ☐ E-Misdemeanor Pending
☐ 2-Felony Ltd. ☐ 5-Felony Pend. ☐ C-Misdemeanor Surrounding States
☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ D-Misdemeanor No Extradition
☐ Distance: _____

DEFENDANT IDENTIFICATION INFORMATION

RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown	Docket Number	Date Filed / /	OTN/LiveScan Number	Complaint/Incident Number 36-595
		DOB 11/18/1949		POB	
		Add'l DOB / /		SSN	Add'l SSN - -
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female		First Name	Middle Name	Last Name	Gen.
AKA					

SID:	HAIR COLOR	<input type="checkbox"/> GRY (Gray)	<input type="checkbox"/> RED (Red/Aubn.)	EYE COLOR
Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	<input type="checkbox"/> BLK (Black)	<input type="checkbox"/> ONG (Orange)	<input type="checkbox"/> BLN (Blonde / Strawberry)	<input type="checkbox"/> GRN (Green)
	<input type="checkbox"/> BLU (Blue)	<input type="checkbox"/> PLE (Purple)	<input type="checkbox"/> WHI (White)	<input type="checkbox"/> GRY (Gray)
	<input type="checkbox"/> BRO (Brown)	<input type="checkbox"/> PNK (Pink)	<input type="checkbox"/> XXX (Unk./Bald)	<input type="checkbox"/> MUL (Multicolored)
	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> SDY (Sandy)	<input checked="" type="checkbox"/> BRO (Brown)	<input type="checkbox"/> MAR (Maroon)
				<input type="checkbox"/> XXX (Unknown)

Driver License	State PA	License Number	Expires: / /	WEIGHT (lbs.)
DNA	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	DNA Location		

FBI Number	MNU Number	Ft. HEIGHT in.
Arprint Classification:		

DEFENDANT VEHICLE INFORMATION

Plate #	State	Hazmat <input type="checkbox"/>	Registration Sticker (MM/YY) /	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code
VIN	Year	Make	Model	Style	Color	

Office of the attorney for the Commonwealth ☒ Approved ☐ Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing: See Pa.R.Crim.P. 507).

DAG Laurel Brandstetter

(Name of the attorney for the Commonwealth)

Laurel Brandstetter
(Signature of the attorney for the Commonwealth)

3/43/2013
(Date)

I, SA Robert M. Gift / Cpl. Leo D. Hannon Jr.

(Name of the Affiant)

#139 / #7865

(PSP/MPOETC -Assigned Affiant ID Number & Badge #

of the PA Office of Attorney General/PA State Police

PA065015A

(Identify Department or Agency Represented and Political Subdivision)

(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above

☐ I accuse the defendant whose name is unknown to me but who is described as _____

☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at []

(Subdivision Code) (Place-Political Subdivision)

in Dauphin County

[]

on or about February 2004 through September 8, 2010

(County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number 36-595
Defendant Name	First: Jeffrey	Middle:	Last: Suzenski

Acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate :

(Set forth a **brief** summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A
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<input type="checkbox"/> Lead?	1	1103	(b)	of the	65	1	F3		
	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description/Acts of the accused associated with this Offense: 1

Restricted Activities

On or about March 1, 2008 and dates thereafter, the Actor, offered or gave to a public official or public employee, namely George Hatalowich and/or others employed by or associated with the Pennsylvania Turnpike Commission, anything of monetary value, including a gift, loan, political contribution, reward or promise of future employment based on the offeror's or donor's understanding that the vote, official action or judgment of the public official or public employee would be influenced thereby, in violation of Section 1103(b) of the Pennsylvania Code of Public Officers, Public Employee Ethics Act of October 15, 1998, 65 Pa.C.S.A. §1103(b).

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A
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<input type="checkbox"/> Lead?	2			of the					
	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
---------------------------------	--------------------	--	--------------------------------------	------------------------------------

Statute Description/Acts of the accused associated with this Offense:

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A
------------------	--	---	---	---	---	---	--

<input type="checkbox"/> Lead?				of the					
	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description/Acts of the accused associated with this Offense: 3

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: Dauphin

Magisterial District Number: 12-3-03
MDJ: Hon. William Wenner
Address: 5925 Stevenson Avenue, Suite B
Harrisburg, PA 17112
Telephone: (717)545-0261



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

(NAME and ADDRESS):

Melvin

Shelton

MR.

First Name

Middle Name

Last Name

Gen.

6000 West Oxford Street, Philadelphia, PA 19151

NCIC Extradition Code Type

- ☐ 1-Felony Full ☐ 4-Felony No Ext. ☐ B-Misdemeanor Limited ☐ E-Misdemeanor Pending
☐ 2-Felony Ltd. ☐ 5-Felony Pend. ☐ C-Misdemeanor Surrounding States
☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ D-Misdemeanor No Extradition
☐ Distance: _____

DEFENDANT IDENTIFICATION INFORMATION

RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input checked="" type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown	Docket Number DOB 03/18/1931 Add'l DOB / /	Date Filed / /	OTN/LiveScan Number	Complaint/Incident Number 36-595	
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female		POB	SSN	Add'l SSN - -		
SID:		First Name	Middle Name	Last Name	Gen.	
Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		HAIR COLOR <input checked="" type="checkbox"/> BLK (Black) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> BLN (Blonde / Strawberry) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> WHI (White) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> XXX (Unk./Bald)		EYE COLOR <input type="checkbox"/> BLK (Black) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> XXX (Unknown) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> MAR (Maroon)		
Driver License	State PA	License Number	Expires: / /	WEIGHT (lbs.)		
DNA	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	DNA Location				
Fingerprint Classification		MNU Number				
Ft.		HEIGHT	In.			

DEFENDANT VEHICLE INFORMATION

Plate #	State	Hazmat <input type="checkbox"/>	Registration Sticker (MM/YY)	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code
VIN	Year	Make	Model	Style	Color	

Office of the attorney for the Commonwealth ☒ Approved ☐ Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

DAG Laurel Brandstetter

(Name of the attorney for the Commonwealth)

Laurel Brandstetter
(Signature of the attorney for the Commonwealth)

3/13/2013
(Date)

I, SA Robert M. Gift / Cpl. Leo D. Hannon Jr.

#139 / #7865

(PSP/MPOETC -Assigned Affiant ID Number & Badge #

of the PA Office of Attorney General/PA State Police

PA065015A

(Police Agency ORI Number)

(Identify Department or Agency Represented and Political Subdivision)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above

☐ I accuse the defendant whose name is unknown to me but who is described as _____

☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at []

(Subdivision Code) (Place-Political Subdivision)

in Dauphin County

[]

on or about January 22, 2008 and dates thereafter

(County Code)



POLICE CRIMINAL COMPLAINT

Jocket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number 36-595
Defendant Name	First: Jeffrey	Middle:	Last: Suzenski

2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 PA.C.S.§4904) relating to unsworn falsification to authorities.
4. This complaint is comprised of the preceding Page, as well as the attached pages that follow, numbered ____ through ____, specifying offenses and Participants, if any.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date)

(Signature of Affiant)

AND NOW, on this date _____ I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

(Magisterial District Court Number)

(Issuing Authority)

SEAL



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number 36-595
Defendant Name	First: Melvin	Middle:	Last: Shelton

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate :
(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A
-------------------------	---	--	--	--	--	--	---

<input type="checkbox"/>	1	3921	(a)	of the	18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone				

Statute Description/Acts of the accused associated with this Offense: 1

Theft by Unlawful Taking

On or about January 22, 2008 and dates thereafter, the Actor, unlawfully took or exercised unlawful control over movable property of another, namely, gasoline in excess of \$2,000.00 belonging to the Pennsylvania Turnpike Commission, with the intent to deprive the owner thereof, namely the Actor used the authority of his position for his benefit by obtaining PTC resources, for his own personal use, in violation of Section 3921(a) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §3921(a).

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A
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<input type="checkbox"/>	2	3922	(a)(1)	of the	18	1	F3		
?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone				

Statute Description/Acts of the accused associated with this Offense: 2

Theft by Deception

On or about January 22, 2008 and dates thereafter, the Actor intentionally obtained or withheld property, namely, gasoline in excess of \$2,000.00, by creating a false impression that the gasoline would be used during official business of the Pennsylvania Turnpike Commission, when in fact, the Actor obtained the gasoline for his personal use, in violation of Section 3922(a)(1) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa. C.S.A. §3922(a)(1).

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A
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<input type="checkbox"/>	3	3921	(a)	of the	18	1	M1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone				

Statute Description/Acts of the accused associated with this Offense: 3

Theft by Unlawful Taking

On or about August 5, 2010 and dates thereafter, the Actor, unlawfully took or exercised unlawful control over movable property of another, namely, salary in excess of \$200.00 belonging to the Pennsylvania Turnpike Commission, with the intent to deprive the owner thereof, namely the Actor did use the authority of his position for his benefit by failing to work the hours required of his position with the Pennsylvania Turnpike Commission, in violation of Section 3921(a) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §3921(a).



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number 36-595
Defendant Name	First: Melvin	Middle:	Last: Shelton

2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 PA.C.S. §4904) relating to unsworn falsification to authorities.
4. This complaint is comprised of the preceding Page, as well as the attached pages that follow, numbered ___ through ___, specifying offenses and Participants, if any.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date)

(Signature of Affiant)

AND NOW, on this date _____ I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

(Magisterial District Court Number)

(Issuing Authority)

SEAL

**POLICE CRIMINAL COMPLAINT
ATTACHMENT**

Statute Description / Acts of the accused associated with this offense: 4

Theft by Deception

18 Pa.C.S.A. §3922(a)

Grade – M1

On or about August 5, 2010 and dates thereafter, the Actor, intentionally obtained or withheld property, namely, salary in excess of \$200.00 by creating a false impression that he would work the hours required of his position with the Pennsylvania Turnpike Commission, when in fact, the Actor failed to do so, in violation of Section 3922(a) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §3922(a).

Statute Description / Acts of the accused associated with this offense: 5

Misapplication of Entrusted Property and Property of Government or Financial Institutions

18 Pa.C.S.A. §4113(a)

Grade – M2

On or about January 22, 2008 and dates thereafter, the Actor applied or disposed of property, namely, gasoline obtained at maintenance sheds belonging to the Pennsylvania Turnpike Commission in excess of \$50.00, that had been entrusted to him as a fiduciary and/or as government property, while he was employed by the Pennsylvania Turnpike Commission, in a manner which the Actor knew was unlawful and involved substantial risk of loss or detriment to the PTC, namely, the Actor failed to use the gasoline and his Turnpike issued vehicle for its stated purpose and/or intentionally dealt with the property as his own, in violation of Section 4113(a) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §4113(a).

**POLICE CRIMINAL COMPLAINT
ATTACHMENT**

Statute Description / Acts of the accused associated with this offense: 6

Misapplication of Entrusted Property and Property of Government or Financial Institutions

18 Pa.C.S.A. §4113(a)

Grade – M2

On or about August 5, 2010 and dates thereafter, the Actor applied or disposed of property, namely, salary provided by the Pennsylvania Turnpike Commission in excess of \$50.00, that had been entrusted to him as a fiduciary and/or as government property, while he was employed by the Pennsylvania Turnpike Commission, in a manner which the Actor knew was unlawful and involved substantial risk of loss or detriment to the PTC, namely, the Actor failed work the hours required of his position and/or intentionally dealt with the funds as his own, in violation of Section 4113(a) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §4113(a).

Statute Description / Acts of the accused associated with this offense: 7

Unauthorized Use of Automobiles and Other Vehicles

18 Pa.C.S.A. §3928(a)

Grade – M2

On or about January 22, 2008 and dates thereafter, the Actor operated an automobile, namely, a 2004 Chevrolet Tahoe and/or a 2006 Chevrolet Tahoe belonging to the Pennsylvania Turnpike Commission without consent of the owner, namely, the Actor took his Turnpike issued vehicle out of state for personal use, in violation of Section 3928(a) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §3928(a).

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: Dauphin

Magisterial District Number: 12-3-03
MDJ: Hon. William Wenner
Address: 5925 Stevenson Avenue, Suite B
Harrisburg, PA 17112
Telephone: (717)545-0261



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

(NAME and ADDRESS):

Raymond

J

Zajcek

MR.

First Name

Middle Name

Last Name

Gen.

731 Hidden Lake Drive, Tarpon Springs, FL 34689

NCIC Extradition Code Type

- ☐ 1-Felony Full ☐ 4-Felony No Ext. ☐ B-Misdemeanor Limited ☐ E-Misdemeanor Pending
☐ 2-Felony Ltd. ☐ 5-Felony Pend. ☐ C-Misdemeanor Surrounding States
☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ D-Misdemeanor No Extradition
☐ Distance: _____

DEFENDANT IDENTIFICATION INFORMATION

RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown	Docket Number DOB 05/10/1945 Add'l DOB / /	Date Filed / /	OTN/LiveScan Number	Complaint/Incident Number 36-595	
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female		First Name AKA	Middle Name	Last Name	Gen.	
SID: Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		HAIR COLOR <input type="checkbox"/> GRY (Gray) <input checked="" type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> BLN (Blonde / Strawberry) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> WHI (White) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> SDY (Sandy)		EYE COLOR <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> XXX (Unknown) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> MAR (Maroon)		
Driver License	State PA	License Number	Expires: / /	WEIGHT (lbs.)		
DNA	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	DNA Location				
Fingerprint Classification		MNU Number		Ft. HEIGHT in.		

DEFENDANT VEHICLE INFORMATION

Plate #	State	Hazmat <input type="checkbox"/>	Registration Sticker (MM/YY)	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code
VIN	Year	Make	Model	Style	Color	

Office of the attorney for the Commonwealth ☒ Approved ☐ Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

DAG Laurel Brandstetter

(Name of the attorney for the Commonwealth)

Laurel Brandstetter
(Signature of the attorney for the Commonwealth)

3/13/2013
(Date)

I, SA Robert M. Gift / Cpl. Leo D. Hannon Jr.

(Name of the Affiant)

#139 / #7865

(PSP/MPOETC -Assigned Affiant ID Number & Badge #

of the PA Office of Attorney General/PA State Police

(Identify Department or Agency Represented and Political Subdivision)

PA065015A

(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above
☐ I accuse the defendant whose name is unknown to me but who is described as _____

☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at []

(Subdivision Code)

(Place-Political Subdivision)

in Dauphin County

[]

on or about June 7, 2011 through July 7, 2011

(County Code)

**POLICE CRIMINAL COMPLAINT
ATTACHMENT**

Statute Description / Acts of the accused associated with this offense: 8

Perjury

18 Pa.C.S.A. §4902(a)

Grade – F3

On or about May 2, 2011, the Actor, in an official proceeding, namely, testimony before the Unemployment Compensation Board of Review, made, while under oath or equivalent affirmation, a false statement, namely, the Actor testified that he worked 24/7 for the Pennsylvania Turnpike Commission and that he did so on the dates he was under surveillance by private investigators, when said statements were material and the Actor did not believe the statements to be true, in violation of Section 4902(a) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §4902(a).

Statute Description / Acts of the accused associated with this offense: 9

False Swearing

18 Pa.C.S.A. §4903(a)(1)

Grade – M2

On or about May 2, 2011, the Actor, in an official proceeding, namely, testimony before the Unemployment Compensation Board of Review, made, while under oath or equivalent affirmation, a false statement, namely, the Actor testified that he worked 24/7 for the Pennsylvania Turnpike Commission and that he did so on the dates he was under surveillance by private investigators when said statements were material and the Actor did not believe the statements to be true, in violation of Section, in violation of Section 4903(a) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §4903(a).



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number 36-595
Defendant Name	First: Raymond	Middle: J	Last: Zajicek

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate :

(Set forth a **brief** summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A
<input type="checkbox"/>	1	3921	(a)	of the	18	1	F3
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description/Acts of the accused associated with this Offense: 1

Theft by Unlawful Taking

On or about June 7, 2011 and dates thereafter, the Actor, unlawfully took or exercised unlawful control over movable property of another, namely, salary in excess of \$2,000.00 belonging to the Pennsylvania Turnpike Commission, with the intent to deprive the owner thereof, namely the Actor did use the authority of his position for his benefit by failing to work the hours required of his position with the Pennsylvania Turnpike Commission, in violation of Section 3921(a) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §3921(a).

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A
<input type="checkbox"/>	2	3922	(a)(1)	of the	18	1	F3
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description/Acts of the accused associated with this Offense: 2

Theft by Deception

On or about June 7, 2011 and dates thereafter, the Actor intentionally obtained or withheld property, namely, salary in excess of \$2,000.00, by creating a false impression that he would work the hours required of his position with the Pennsylvania Turnpike Commission, when in fact, the Actor performed personal errands and/or failed to report to work, in violation of Section 3922(a)(1) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa. C.S.A §922(a)(1).

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A
<input type="checkbox"/>	3	3921	(a)	of the	18	1	M1
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description/Acts of the accused associated with this Offense: 3

Theft by Unlawful Taking

On or about June 8, 2011 and dates thereafter, the Actor, unlawfully took or exercised unlawful control over movable property of another, namely, a 2008 Chevrolet Impala, valued in excess of \$200.00 belonging to the Pennsylvania Turnpike Commission, with the intent to deprive the owner thereof, namely the Actor used the authority of his position for his benefit by using his Turnpike issued vehicle for personal use and after working hours, in violation of Section 3921(a) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §3921(a).



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number 36-595
Defendant Name	First: Raymond	Middle:	Last: Zajicek

2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 PA.C.S.§4904) relating to unsworn falsification to authorities.
4. This complaint is comprised of the preceding Page, as well as the attached pages that follow, numbered ____ through ____, specifying offenses and Participants, if any.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date)

(Signature of Affiant)

AND NOW, on this date _____ I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

(Magisterial District Court Number)

(Issuing Authority)

SEAL

**POLICE CRIMINAL COMPLAINT
ATTACHMENT**

Statute Description / Acts of the accused associated with this offense: 4

Theft by Deception

18 PA C.S. § 3922 (a)

Grade – M1

On or about June 8, 2011 and dates thereafter, the Actor, intentionally obtained or withheld property, namely, a 2008 Chevrolet Impala, valued in excess of \$200.00 by creating a false impression that he would use the Turnpike assigned vehicle for official work purposes, when in fact, the Actor used the vehicle for his personal use and after work hours, in violation of Section 3922(a) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. § 3922(a).

Statute Description / Acts of the accused associated with this offense: 5

Misapplication of Entrusted Property and Property of Government or Financial Institutions

18 PA C.S. § 4113 (a)

Grade – M2

On or about June 7, 2011 and dates thereafter, the Actor applied or disposed of property, namely, salary in excess of \$50.00, that had been entrusted to him as a fiduciary and/or as government property, while he was employed by the Pennsylvania Turnpike Commission, in a manner which the Actor knew was unlawful and involved substantial risk of loss or detriment to the PTC, namely, the Actor failed to work the hours required of his position with the Pennsylvania Turnpike Commission and/or intentionally dealt with the funds as his own, in violation of Section 4113(a) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa. C.S. Section 4113(a).

**POLICE CRIMINAL COMPLAINT
ATTACHMENT**

Statute Description / Acts of the accused associated with this offense: 6

Misapplication of Entrusted Property and Property of Government or Financial Institutions

18 PA C.S. §4113 (a)

Grade – M2

On or about June 8, 2011 and dates thereafter, the Actor applied or disposed of property, namely, use of a 2008 Chevrolet Impala provided by the Pennsylvania Turnpike Commission and valued in excess of \$50.00, that had been entrusted to him as a fiduciary and/or as government property, while he was employed by the Pennsylvania Turnpike Commission, in a manner which the Actor knew was unlawful and involved substantial risk of loss or detriment to the PTC, namely, the Actor used the vehicle for personal use and after work hours and/or intentionally dealt with the property as his own, in violation of Section 4113(a) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa. C.S.A. §4113(a).

Statute Description / Acts of the accused associated with this offense: 7

Unauthorized Use of Automobiles and Other Vehicles

18 PA C.S. §3928 (a)

Grade – M2

On or about June 8, 2011 and dates thereafter, the Actor operated an automobile, namely, a 2008 Chevrolet Impala belonging to the Pennsylvania Turnpike Commission without consent of the owner, namely, the Actor operated his Turnpike issued vehicle for personal use and after work hours, in violation of Section 3928(a) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. §3928(a).

**POLICE CRIMINAL COMPLAINT
ATTACHMENT**

Statute Description / Acts of the accused associated with this offense: 8

Simple Assault

18 PA C.S. §2701(a)(1)

Grade – M2

On or about July 20, 2010, the Actor, attempted to cause or intentionally, knowingly or recklessly caused bodily injury to another, namely during a meeting held at the Pennsylvania Turnpike's Western Regional Office the Actor struck and/or otherwise assaulted Gary Pedicone, in violation of Section 2701(a)(1) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa.C.S.A. § 2701(a)(1).

